

**UNITED STATES DISTRICT COURT  
DISTRICT OF MASSACHUSETTS**

UNITED STATES OF AMERICA,  
v.  
AMIN KHOURY,  
Defendant.

Case No. 20-cr-10177-PBS

**ASSENTED-TO MOTION FOR LEAVE TO FILE OBJECTIONS TO ORDER ON  
MOTION TO QUASH TRIAL SUBPOENAS UNDER SEAL ON BEHALF OF  
CHARLES DEACON, JAMES COLMAN, AND LEE REED**

Non-parties and Georgetown University employees Charles Deacon, James Colman, and Lee Reed (the “Georgetown Employees”), by and through undersigned counsel, hereby respectfully move this Court for leave to file under seal their objections to Magistrate Judge Kelley’s Order denying their motion to quash trial subpoenas served by Defendant Amin Khoury (Dkt. 175).

This Court previously granted the Georgetown Employees’ motion to file their motion to quash under seal (Dkt. 150), and the opposition to that motion and Magistrate Judge Kelley’s Order are also under seal. The objections will contain a description of that sealed Order as well as confidential medical information about the Georgetown Employees.

WHEREFORE, for these reasons, Mr. Deacon, Mr. Colman, and Mr. Reed request that this Court allow them to file their objections to the Order denying their motion to quash under seal.

Respectfully submitted,

Dated: April 22, 2022

/s/ George P. Varghese

---

George P. Varghese (#706861)  
WILMER CUTLER PICKERING HALE  
AND DORR LLP  
60 State Street  
Boston, MA 02109  
Tel.: (617) 526-6524  
Fax: (617) 526-5000  
george.varghese@wilmerhale.com

Bruce M. Berman\*  
WILMER CUTLER PICKERING HALE  
AND DORR LLP  
1875 Pennsylvania Avenue, NW  
Washington, DC 20006  
Tel.: (202) 663-6781  
Fax: (202) 663-6363  
bruce.berman@wilmerhale.com

\* *Admitted pro hac vice*

**CERTIFICATE OF COMPLIANCE WITH LOCAL RULE 7.1(a)(2)**

Pursuant to Local Rule 7.1(a)(2), I hereby certify that on March 25, 2022, counsel for Mr. Deacon, Mr. Colman, and Mr. Reed conferred via telephone with counsel for movant, Defendant Amin Khoury in a good faith effort to resolve or narrow the issues presented in this motion. Counsel for Defendant Khoury advised that Defendant Khoury assents to the filing of documents related to the motions to quash under seal.

*/s/ George P. Varghese*  
George P. Varghese (#706861)

**CERTIFICATE OF SERVICE**

I hereby certify that this document filed through the ECF system will be sent electronically to the registered participants as identified on the Notice of Electronic Filing (NEF) and paper copies will be sent to those indicated as nonregistered participants on April 22, 2022.

*/s/ George P. Varghese*

George P. Varghese